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October 7, 1996

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

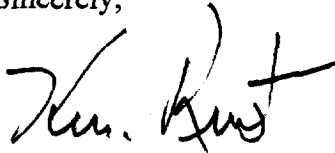
Re: CC Docket No. 96-45

Dear Mr. Caton:

Today, Frank Gumper and I, representing NYNEX, met with Anna Gomez, Chief of the Universal Service Branch, regarding the item captioned above. The attached material formed the basis of the discussion in the meeting.

Any questions on this matter should be directed to me at either the address or the telephone number shown above.

Sincerely,



Attachment

cc: A. Gomez (letter only)

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List A B C D E



NYNEX Recycles

NYNEX Proposal for Universal Service

Post 96-98 Interconnection Order

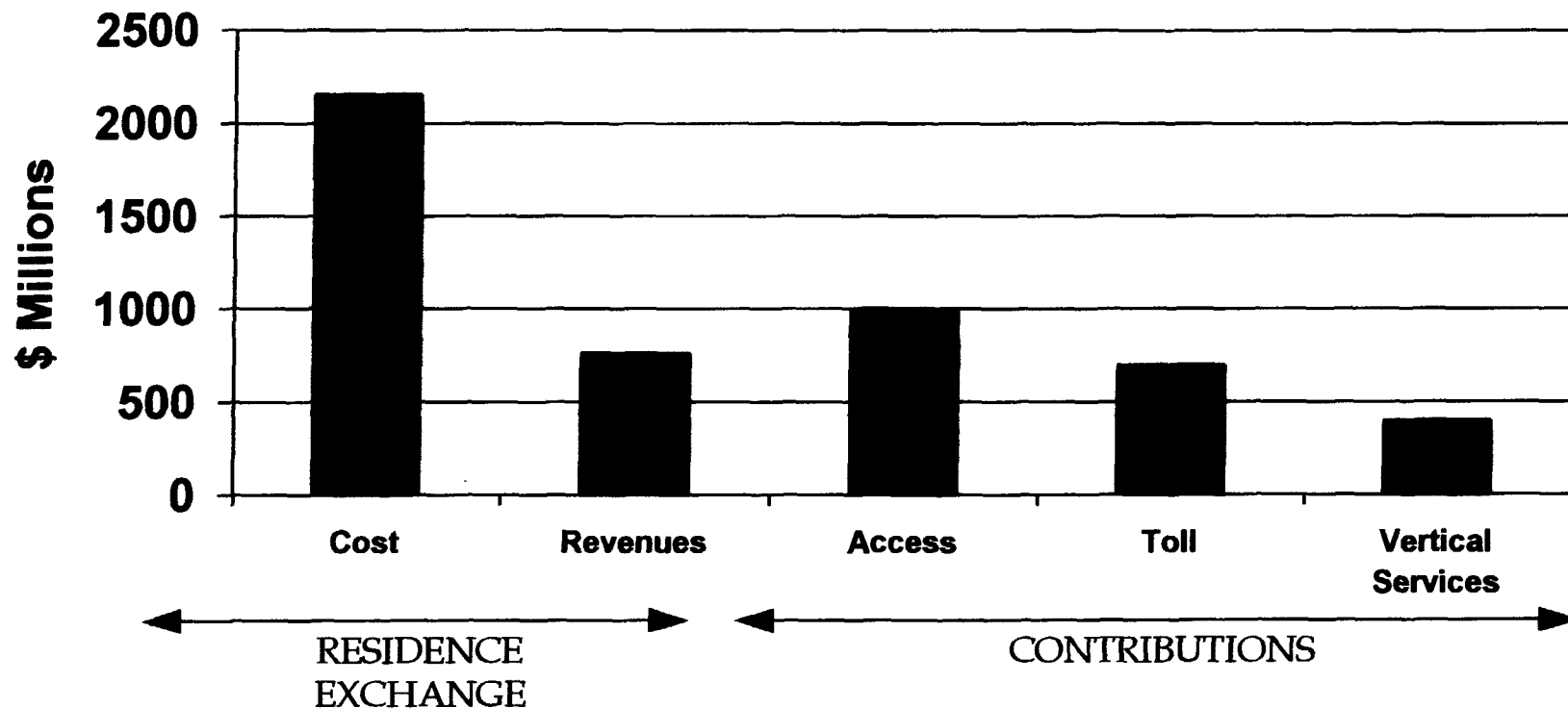
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NYNEX.

What is the Problem?

- Current system of massive cross subsidies is incompatible with the Act and FCC Interconnection Order
- Historical use of separations process to support local rates needs to be addressed.
- FCC Interconnection Order requires rapid action.

Existing Universal Service Support System

NYNEX New York Revenue/Cost Study

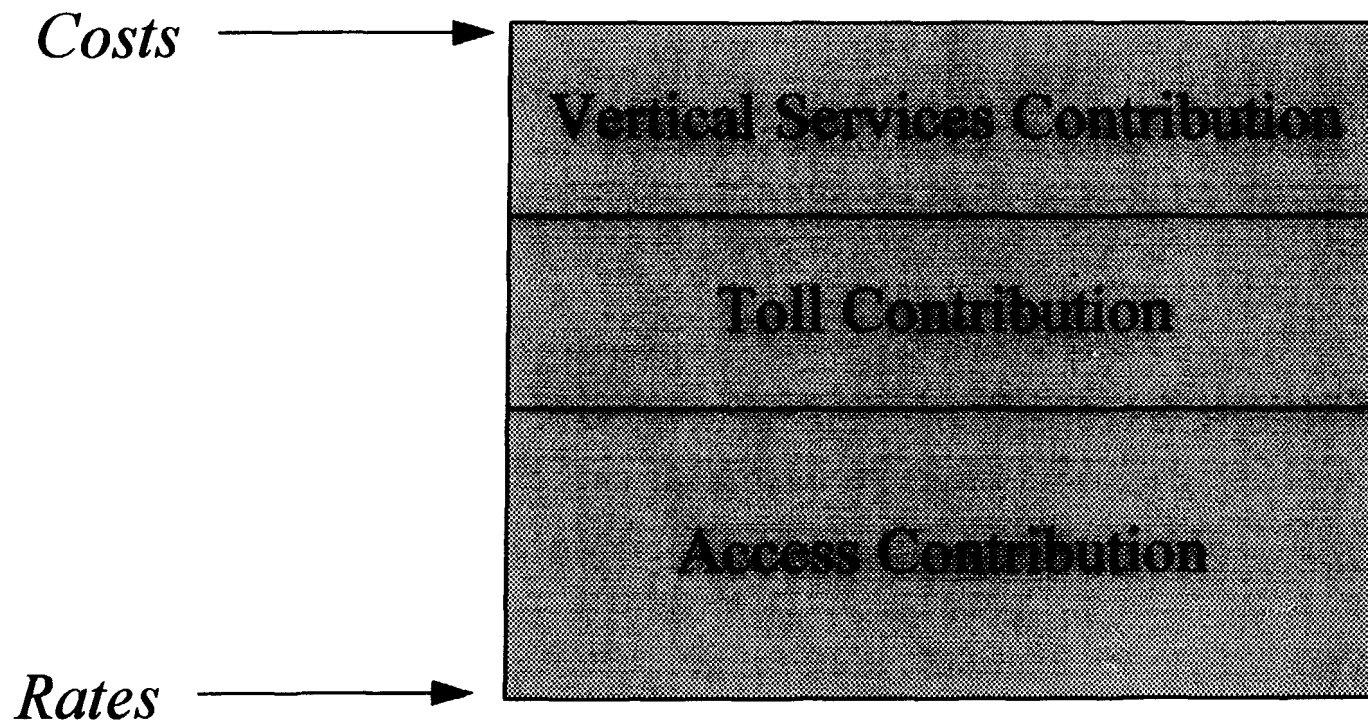


What Do We Mean by Actual Costs?

Actual costs include:

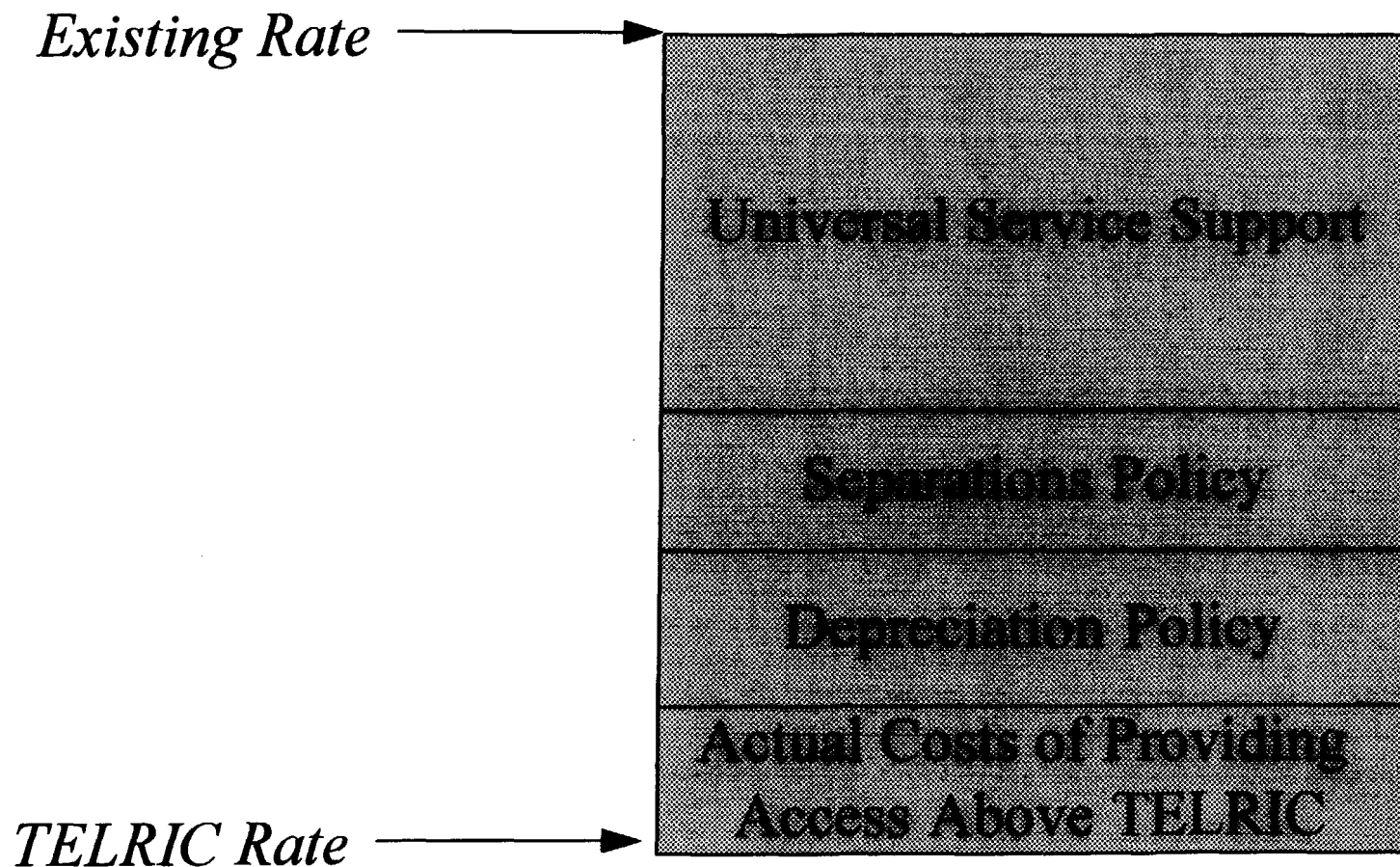
- NYNEX's current expenses of running its network and providing service
- Depreciation
- Taxes
- Interest on debt
- Cost of equity capital

Existing Intrastate Contributions to Residence Exchange Service



*FCC policy adopting TELRIC
potentially erodes these contributions.*

Relationship Between Existing Interstate Access Rates and TELRIC Rates



Percent Costs Allocated to Interstate Jurisdiction

STATES:

New York: 27.1%

Massachusetts: 27.3%

New Hampshire: 31.4%

Vermont: 30.1%

Maine: 27.5%

Rhode Island: 27.8%

NYNEX: 27.4%

RBOCS:

Ameritech: 24.0%

Bell Atlantic: 27.8%

Bell South: 24.7%

PacBell: 22.1%

SBC: 25.7%

USWest: 27.5%

NATIONAL AVERAGE: 25.7%

One Solution: Fix Separations and Push Costs Back to Intrastate Jurisdiction

- Lengthy process
- Contentious - compounds State problem
- Doesn't address mandate of the Act to make subsidies explicit
- Don't have time: Universal Service deadline 5/8/97; Interconnection deadline is 7/1/97

Universal Service Should Cover

- Residence exchange
- Local usage (100-150 calls)
- Touch-Tone service
- Access to E911
- Access to Operator Services
- Access to Directory Assistance

Actual Costs Form the Only Equitable Basis for Establishing Universal Service Support

However, if:

- a) Court upholds the FCC, and
- b) FCC intends to continue the use of TELRIC; then NYNEX proposes the following process for Price Cap companies:

Joint Board/ FCC Establish Cost of Universal Service

State Approved TSLRIC Study

or

Nationwide Proxy Model until State
Commission Approves Study

Necessary Linkage between TSLRIC and TELRIC Network Elements

TSLRIC = TELRIC plus Retail Costs

a) TELRIC = Loop
 Port
 Local Switching (100-150 Calls)
 Transport and Terminating Access
 Access to E911, Operator Services
 and Directory Assistance

b) Forward Looking

Retail Costs = State Approved \$ per line to
 Cover Customer Care Costs.

**There is Important Linkage Between Unbundled
Network Elements and USF Support:**

*Geographical Deaveraging
Must be the Same.*

Joint Board/ FCC

Establishes Benchmark Rate

- 1% of median household income.
 - If data are available, adjust for regional cost of living variations.
- Need to use aggregated county data, not state data, to recognize significant variations of incomes within a State.
- Use targeted support for low income subscribers within the county.

Example:

Why County, Not State?

	<u>BCM2 Cost</u>	<u>1% Income</u>
NYNEX New York Avg.	\$25.05	\$26.58
NYNEX New York		
NYC	18.03	24.72
Other Major Cities	24.18	33.76
Urban	26.29	30.72
Suburban	29.47	25.02
Rural	42.74	20.52

Note:

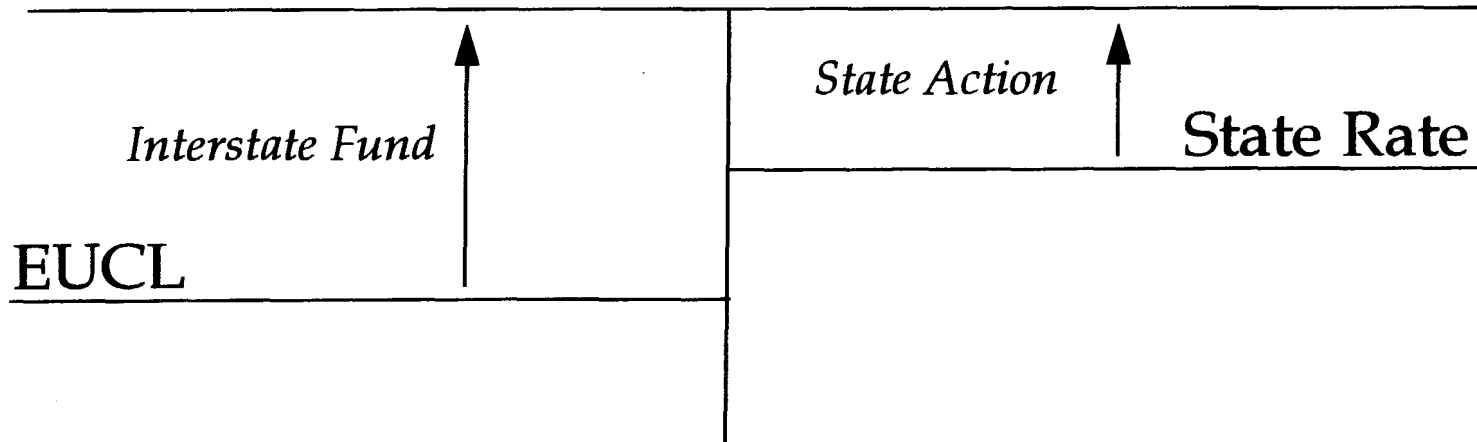
BCM2 not true TSLRIC Model.

Median Income of zones based upon county data.

Urban Example

Benchmark

TSLRIC



Rural Example

TSLRIC

National Fund

Benchmark

Interstate Fund

State Action

State Rate

EUCL

The Options:

- Jurisdictional funds (Federal and State)
- National fund covers total intrastate and interstate

If Joint Board/FCC pursues total national fund, then USF revenues should be split based upon percentage of interstate access to the combination of inter- and intrastate access, intrastate toll and vertical services.

PERCENT SPLIT OF USF

	Intrastate	Interstate
NYNEX	54%	46%
New York	54%	46%
Massachusetts	55%	45%
Vermont	53%	47%
New Hampshire	50%	50%
Maine	70%	30%
Rhode Island	40%	60%

Use of USF Monies

Increased USF monies should be used to
reduce interstate access charges
(e.g., CCL, RIC, Local Switching)

and

Intrastate access charges, toll and
vertical services

Allocating and Collecting USF

To be competitively neutral, allocation and collection of USF must be linked.

A plan that places an unequal burden on retail customers of different companies

IS NOT

a competitively neutral mechanism.

Likewise: Hiding Universal Service Funding in Customers Rates is Implicit, Not Explicit Funding

Solution:

Need a uniform surcharge on retail revenues.

Example: USF = \$500 Million

(Two Companies)

<i>(\$ Millions)</i>	<i>Carrier A</i>	<i>Carrier B</i>
Retail Revenue	2,000	2,000
<u>Carrier Revenue</u>	<u>1,000</u>	<u>-</u>
Gross Revenue	3,000	2,000

Case 1: Use Retail Revenues. Total = \$4,000 million

Carrier A pays \$250 million and Carrier B pays \$250 million

Surcharge Retail:

Carrier A = 12.5% and Carrier B = 12.5%

Explicit and Competitively Neutral

Example: USF = \$500 Million (Two Companies)

Case 2: Use Gross Revenues

Carrier A pays \$300 million and Carrier B pays \$200 million
Collection:

a) Both Apply Surcharge to End Users

Carrier A = 15% and Carrier B = 10%

b) Carrier A Applies Surcharge to All Revenues, Required
End User Surcharge:

Carrier A = 10% and Carrier B = 15%

Not Competitively Neutral